No. 87-764

Supreme Court, U.S.
FILED
JUN 30 1988
JOSEPH F. SPANIOL, JR.
CLERK

In the Supreme Court of the United States

OCTOBER TERM, 1987

THE PEOPLE OF THE STATE OF FLORIDA,
Petitioner,

vs.

MICHAEL A. RILEY,
Respondent.

ON WRIT OF CERTIORARI TO THE FLORIDA SUPREME COURT

BRIEF OF THE CALIFORNIA ATTORNEYS FOR CRIMINAL JUSTICE AND CIVIL LIBERTIES MONITORING PROJECT AS AMICI CURIAE IN SUPPORT OF RESPONDENT

*RONALD M. SINOWAY
NANCY DIAMOND
RONALD M. SINOWAY, INC.
P.O. Box 1339
Redway, California 95560
(707) 923-3905
Attorneys for Amici Curiae California Attorneys for Criminal Justice and Civil Liberties Monitoring Project

*Counsel of Record

E. L. MENDENHALL, INC., 926 Cherry Street, Kansas City, Mo. 64106, (816) 421-3030

QUESTION PRESENTED

Whether ground observations from a helicopter at an altitude of 400 feet over residential backyards violate reasonable expectations of privacy within the meaning of the Fourth Amendment.

TABLE OF CONTENTS

QUESTION PRESENTED 1
INTERESTS OF AMICI CURIAE 1
SUMMARY OF ARGUMENT 2
ARGUMENT—
I. LOW FLYING POLICE HELICOPTER OBSERVATIONS INTO THE CURTILAGE VIOLATE REASONABLE EXPECTATIONS OF PRIVACY WITHIN THE MEANING OF THE FOURTH AMENDMENT 3
1. Low flying helicopter surveillance of the curtilage invades, harasses and intrudes into the sanctity of home and privacies of life 3
2. Society reasonably expects that the curtilage will be free from warrantless governmental intrusion by low flying helicopters 6
II. A CLEAR, EASILY FOLLOWED RULE WOULD PROHIBIT ALL HELICOPTER SURVEILLANCE OF THE CURTILAGE FROM AN ALTITUDE BELOW 500 FEET 10
1. Prohibiting helicopter surveillance of the curtilage from altitudes within a hemisphere of 500 feet surrounding the curtilage would provide a clear standard for law enforcement officers 10
2. Amici's proposed bright line rule is consistent with *Ciraolo* and is readily understandable 11

3. Petitioner's proposed rule would not provide clear guidance to law enforcement 13
CONCLUSION 15
CERTIFICATE OF SERVICE 16

TABLE OF AUTHORITIES

Cases

California v. Ciraolo, 476 U.S. 207 (1986) 5, 6, 7, 8, 9, 13
Colorado v. Bertine, ... U.S. ....., 107 S.Ct. 738 (1987) 10
Dow Chemical Co. v. United States, 476 U.S. 227 (1986) 5, 6, 7, 8, 9
Dunaway v. New York, 442 U.S. 200, 60 L.Ed. 2d 824, 99 S.Ct. 2248 (1979) 10
Illinois v. Lafayette, ... U.S. ....., 103 S.Ct. 2605 10
Katz v. United States, 389 U.S. 347 (1967) 7
Michigan v. Summers, 442 U.S. 692, 101 S.Ct. 2587 (1981) 10
National Organization for the Reform of Marijuana Laws (NORML) et al. v. Mullen et al., No. C83 4037 RPA, *main opinion found at* 608 F.Supp. 945 (N.D. Cal. 1985), *aff'd in part, remanded in part*, 796 F.2d 296 (9th Cir. 1986) 2, 3, 5, 6, 8, 9, 11
National Organization for the Reform of Marijuana Laws (NORML) et al. v. Mullen et al. (Monitor Order), 112 F.R.D. 120 (N.D.Cal. 1986), *aff'd*, 828 F.2d 536 (9th Cir. 1987) 5, 7
New York v. Belton, 453 U.S. 454, 101 S.Ct. 2860 (1981) 10
O'Conner v. Ortega, ... U.S. ....., 107 S.Ct. 1492 (1987) 10
Oliver v. United States, 466 U.S. 170 (1984) 6, 7, 10

Payton v. New York, 445 U.S. 573 (1980) 6
Riley v. State, 511 So.2d 282 (Fla. 1987) 13

Constitutional Provision

United States Constitution, Fourth Amendment 3, 6, 7, 10, 14, 15

Statute

49 U.S.C. section 1301(29) 13

Rule

Fed.R.Civ.P. 53 5

Other

14 C.F.R. section 91.79 (1988) 13
14 C.F.R. section 91.79(b)(7) (1988) 11
14 C.F.R. section 91.79(d) (1988) 14

No. 87-764

In the Supreme Court of the United States

OCTOBER TERM, 1987

THE PEOPLE OF THE STATE OF FLORIDA,
Petitioner,

vs.

MICHAEL A. RILEY,
Respondent.

ON WRIT OF CERTIORARI TO THE FLORIDA SUPREME COURT

BRIEF OF THE CALIFORNIA ATTORNEYS FOR CRIMINAL JUSTICE AND CIVIL LIBERTIES MONITORING PROJECT AS AMICI CURIAE IN SUPPORT OF RESPONDENT

INTERESTS OF AMICI CURIAE

The California Attorneys for Criminal Justice ("CACJ") is a state-wide criminal defense bar comprised of 1,900 attorneys active in criminal defense. CACJ seeks to intervene as Amicus Curiae in cases involving serious impact on the administration of criminal justice.

The Civil Liberties Monitoring Project ("CLMP") is a nonprofit California corporation with principal focus on the continued preservation and enhancement of individual rights and liberties. CLMP engages in discussions and other forms of education concerning civil liberties and civil rights. General aerial surveillance by helicopter can threaten the privacy and welfare of the

organization's members, particularly because many of its members live in isolated areas in rural counties subject to this new law enforcement technique. CLMP has been engaged in class action litigation with the United States and State of California, *inter alia*, challenging governmental helicopter surveillance as violative of civil rights. *National Organization for the Reform of Marijuana Laws (NORML) et al. v. Mullen et al.*, No. C83 4037 RPA, *main opinion found at* 608 F.Supp. 945 (N.D.Cal. 1985), *aff'd in part, remanded in part*, 796 F.2d 296 (9th Cir. 1986). *NORML v. Mullen* has resulted in a Consent Decree, *inter alia*, governing helicopter activities during marijuana raids in California through at least 1990.

SUMMARY OF ARGUMENT

The state writes as if the case concerned only a marijuana garden. In fact, at stake in this case is the privacy of Americans in their homes and curtilages.

Low flying helicopter surveillance of the curtilage unreasonably intrudes into the privacy of the curtilage—a privacy which society has reasonably expected since the beginning of the Republic. The intrusion caused by low flying helicopters is far greater than that caused by fixed-wing aircraft flying in public airspace.

Petitioner unreasonably asks this Court to condone warrantless helicopter surveillance of the curtilage from anywhere. Petitioner's rule has no basis in Fourth Amendment doctrine, and provides no guidance to law enforcement officers while in the field.

Amici respectfully ask this Court to formally acknowledge an aerial zone above the curtilage in which

a privacy expectation exists and is protected by the Fourth Amendment. Amici thus propose a bright line rule which would prohibit warrantless helicopter surveillance from generally anywhere within a hemisphere extending 500 feet from the outer circumference of the curtilage of any residence. This bright line rule is suggested on the basis of the extensive marijuana helicopter litigation in *NORML v. Mullen*, and the standards embodied in the Consent Decree in that case.

ARGUMENT

I

LOW FLYING POLICE HELICOPTER OBSERVATIONS INTO THE CURTILAGE VIOLATE REASONABLE EXPECTATIONS OF PRIVACY WITHIN THE MEANING OF THE FOURTH AMENDMENT

1. Low flying helicopter surveillance of the curtilage invades, harasses and intrudes into the sanctity of home and privacies of life.

Petitioner asserts that there is no "principled distinction between observation from a fixed-wing aircraft and a helicopter." Petitioner's Brief, page 24. Amicus, CLMP, represents residents of rural counties in California who have been subjected to low flying helicopter surveillance of their homes and curtilage since 1983 during the federal "war on drugs," undertaken through the guise of the Campaign Against Marijuana Planting ("CAMP") in California. The experience of class members in *NORML* illustrates the problem with petitioner's assertion when

law enforcement is not operating under strict guidelines during marijuana helicopter activities, and exemplifies the severity of the intrusion which can be caused by unbridled low flying helicopter surveillance:

> One morning, Charles Keyes was at home with his five year old son, Arthur, when "four helicopters in a diamond shape came within 100 feet of our home, shaking and blowing the tree tops. At about 9:30, the largest helicopter came back, put the nose of the helicopter about 100 feet away at my eye level (I live on a hillside) and hovered watching me defecate on my outhouse. I didn't move, so he moved right above me. He blew the toilet paper away from me and Arthur had to retrieve it for me. Arthur and I left the property as I feared for our safety."
>
> Marilyn Beckwith was similarly disturbed when she was "continually buzzed" while taking her outdoor shower.
>
> * * *
>
> Timothy Taylor was working on a carpentry job when three CAMP helicopters "made at least 20 passes directly over the house I was working on at levels I estimate to be 50 to 150 feet above the house. There was no reason for the copters to fly over the house, as there are hundreds of acres in the area without any structures. The copters made at least three passes specifically checking out what was happening at the house site. On all of the passes, the madrone and oak trees were shaking. The copters came so close that they drowned out the sound of the gas generator and skillsaws."

> Alison Osborn testified about one of the several low flights over her home: "The reason I think it was 50 feet is it was right above the tree level, right outside my house, right over my house and at that time they took to their helicopters several times and one of [the] times, made obscene gestures at my seven year old daughter who was standing on the ladder watching. . . ."
>
> When asked what it was like to have a helicopter passing over her at 50 or 100 feet, Osborn responded: "Well, when it's down at 50 feet your hair is actually blowing out and the leaves from the trees are blowing down on your head and the children are kind of hanging on to you because it feels like you'll be gusted away. The fact of the matter is it's terrifying and it's—it feels like you're in Viet Nam in the Viet Nam War and the things you saw on television."

NORML, supra, at 608 F.Supp. 955-56.[1]

---

1. In the original decision in *NORML,* based upon CAMP activities in 1983 and 1984, the court issued a preliminary injunction governing all helicopter and on-ground CAMP field operations in California. In a subsequent opinion, the district court found it necessary to modify the injunction and appoint a Monitor pursuant to Fed.R.Civ.P. 53 due to CAMP personnel non-compliance with the original injunction. 112 F.R.D. 120 (N.D.Cal. 1986), *aff'd,* 828 F.2d 536 (9th Cir. 1987). The modifications to the original injunction required CAMP to engage in daily planning activities to avoid violations of citizens' rights. Following this Court's decisions in *California v. Ciraolo,* 476 U.S. 207 (1986), and *Dow Chemical Co. v. United States,* 476 U.S. 227 (1986), on partial remand, see 796 F.2d 296, the district court issued a clarification of the helicopter restrictions in the preliminary injunction. These modified restrictions prohibited helicopter flight and surveillance anywhere within a hemisphere extending 500 feet from the outer circumference of the curtilage of any residence. In December 1987 a Consent Decree signed by all parties to the litigation issued, accepting, *inter alia,* the 500 foot hemisphere restriction on helicopter flight.

2. Society reasonably expects that the curtilage will be free from warrantless governmental intrusion by low flying helicopters.

It is well settled that an individual may legitimately demand privacy for activities conducted within the curtilage. *See, e.g., Oliver v. United States,* 466 U.S. 170, 178 (1984):

> This rule is true to the conception of the right to privacy embodied in the Fourth Amendment. The Amendment reflects the recognition of the framers that certain enclaves should be free from arbitrary government interference. For example, the Court, since the enactment of the Fourth Amendment has stressed "the overriding respect for the sanctity of the home that has been embedded in our tradition since the origins of the republic." *Payton v. New York,* [445 U.S. 573, 601 (1980)].

Thus, warrantless intrusions into the home and curtilage are *per se* unreasonable, subject to a few exigent circumstances exceptions. *See, e.g., Payton v. New York,* 445 U.S. 573, 601 (1980).

This Court's holdings in *California v. Ciraolo,* 476 U.S. 207 (1986), and *Dow Chemical Co. v. United States,* 476 U.S. 227 (1986), do not overrule the fundamental precept of the Fourth Amendment that the home area is sacred, and indeed recognize that governmental surveillance from "non-public" airspace violates societal expectations of privacy for activities conducted within the home.[2]

---

2. Petitioner's contention that the Fourth Amendment does not protect against visual surveillance squarely contradicts well

(Continued on following page)

In *NORML,* on partial remand of the preliminary injunction, 796 F.2d 296, the district court analyzed *Ciraolo* and *Dow* in the context of helicopter surveillance:

> In *Ciraolo,* police officers investigating a tip flew over respondent's home in an airplane at an altitude of 1,000 feet. The officers readily identified marijuana plants growing in the yard, obtained a search warrant, and seized the plants. After the trial court denied respondent's motion to suppress, he pleaded guilty to a cultivation charge.
>
> The Court found that respondent's expectation of privacy from all government observations of his backyard was unreasonable. That the illicit crop was within the "curtilage" of the home did not itself bar all police observation. The pertinent inquiry was "'whether the government's intrusion infringes upon the personal and societal values protected by the Fourth Amendment.'" *Ciraolo* at [106 S.Ct.] 1812, quoting *Oliver v. United States,* 466 U.S. 170, 180-83 (1984). The Court concluded that the "Fourth Amendment simply does not require police traveling in the public airways at [1,000 feet] to obtain a warrant in order to observe what is viable to the naked eye." *Id.* at [106 S.Ct.] 1813.
>
> Significantly, the Court took pains to note that the overflight was conducted "lawfully" and in "a physi-

---

Footnote continued—

settled Fourth Amendment doctrine first articulated in *Katz v. United States,* 389 U.S. 347, 353 (1967): "[O]nce it is recognized that the Fourth Amendment protects people—and not 'areas'—against unreasonable searches and seizures, it becomes clear that the reach of that Amendment cannot turn upon the presence or absence of a physical intrusion into any given enclosure." This principle was not overruled in either *Ciraolo* or *Dow Chemical Co.*

cally nonintrusive manner," *id.* at [106 S.Ct.] 1812, 1813, and to acknowledge the State's concession in *Dow Chemical* that "[a]erial observation of curtilage may become invasive, either due to physical intrusiveness or through modern technology which discloses to the senses those intimate associations, objects or activities otherwise imperceptible to police or fellow citizens." *Id.* at [106 S.Ct.] 1814 n.3 (emphasis added).

The facts of *Ciraolo* and *Dow Chemical* are readily distinguishable from those of the case at bench. Plaintiffs here do not complain about single overflights of airplanes at 1,000 feet or higher, but of helicopters deliberately and repeatedly "hovering" over, "buzzing," and "dive bombing" their homes at altitudes as low as 50 to 100 feet. As detailed in summaries of testimony at 608 F.Supp. 951-59, law abiding class members have been embarrassed in very private moments by hovering craft, and have found helicopters landing on their property, pursuing them when they were on foot, horseback, or in vehicles. Some plaintiffs appear to have suffered property damage as a result of these practices. The witnesses described the tremendous noise, wind, and psychological impact caused by these low flights, and this Court found that CAMP's helicopter practices "at best disturb and worst terrorize, the hapless residents below." 608 F.Supp. at 957. . . .

* * *

Finally, in contrast to the "routine" character of the *Ciraolo* and *Dow Chemical* flights that were "lawfully" conducted in navigable airspace, *Ciraolo* at [106 S.Ct.] 1813, *Dow Chemical* at [106 S.Ct.] 1822, this Court found that CAMP helicopter pilots regularly violated federal aviation regulations, and endangered the

safety of those on the ground. 608 F.Supp. at 959. Indeed, defendants' violations of these federal safety laws provided an independent ground for the relief granted, in addition to the constitutional grounds. *Id.* at 961 n.13.

In the light of the substantial factual record developed in this case, the Court does not hesitate to find that "the government's intrusion infringes upon the personal and societal values protected by the Fourth Amendment." *Ciraolo* at [106 S.Ct.] 1812, quoting *Oliver v. United States,* 466 U.S. 170, 180-83 (1984). The altitude and route restrictions enumerated in the preliminary injunction are fully merited by both the fourth amendment and federal air safety standards. The restrictions may in fact be too lenient; even at 500 feet helicopters can be raucous and unnerving to residents seeking privacy, peace and quiet in the shelter of their homes and curtilages.

To comport with the fourth amendment analysis of *Ciraolo* and *Dow Chemical,* the Court modifies paragraph 3 of the preliminary injunction to read as follows:

> 3. When conducting surveillance, helicopters shall comply with the provisions of 14 C.F.R. Sections 91.9 and 91.79(b) and (c), but in no case shall fly within 500 feet of any structure, person or vehicle. Helicopters surveying in the vicinity of residential structures shall not fly within the hemisphere extending 500 feet from the outer circumference of the curtilage of any residence.

Order Modifying Paragraph 3 of the Preliminary Injunction, filed September 16, 1986.

II

A CLEAR, EASILY FOLLOWED RULE WOULD PROHIBIT ALL HELICOPTER SURVEILLANCE OF THE CURTILAGE FROM AN ALTITUDE BELOW 500 FEET

1. Prohibiting helicopter surveillance of the curtilage from altitudes within a hemisphere of 500 feet surrounding the curtilage would provide a clear standard for law enforcement officers.

This Court has repeatedly asserted that clear, easily articulated rules are vital to Fourth Amendment protections: "a single, familiar standard is essential to guide police officers who have only limited time and expertise to reflect on and balance social and individual interests involved in the specific circumstances they confront." *Dunaway v. New York*, 442 U.S. 200, 213-214, 60 L.Ed. 2d 824, 99 S.Ct. 2248 (1979).[3]

A clear standard is especially important with respect to helicopter surveillance due to the unique flying capabilities of helicopters which allow them to hover and maneuver in limited distances. These capabilities readily distinguish low flying helicopter surveillance from that of fixed-wing aircraft operating above 1000 feet in the public navigable airspace.

---

3. *See also New York v. Belton*, 453 U.S. 454, 458-459, 101 S.Ct. 2860 (1981); *Michigan v. Summers*, 442 U.S. 692, 101 S.Ct. 2587 (1981); *Illinois v. Lafayette*, U.S. , 103 S.Ct. 2605, 2610; *Oliver v. United States*, 466 U.S. 170, 181 (1984); *O'Conner v. Ortega*, U.S. , 107 S.Ct. 1492, 1505 (1987); *Colorado v. Bertine*, U.S. , 107 S.Ct. 738, 742 (1987).

As recognized by the court in *NORML v. Mullen*, *supra*, at 608 F.Supp. 957:

> It is not just the highly disruptive character of low helicopter flights that distinguishes them from the common airplane overflights that we are all accustomed to, but also the degree of their intrusiveness into "the privacies" of life; an airplane can see far less than a helicopter that is hovering outside a bedroom window or over an open outhouse or shower. This case demonstrates how the unique versatility of helicopters renders them at once an effective law enforcement tool and an unprecedented threat to civil liberties.

Amici thus propose a bright line rule that would prohibit all warrantless helicopter surveillance of the curtilage undertaken from within a hemisphere extending 500 feet from the outer circumference of the curtilage of any residence. The 500 foot line represents a well recognized boundary for minimum safe altitude flight near persons and structures as set forth in Federal Aviation Administration regulations, 14 C.F.R. section 91.79 (b)(7) (1988). Moreover, this proposed rule is based on reasonable expectations of privacy for activities conducted within the curtilage and would strike a compromise between competing interests of these expectations and law enforcement goals.

2. Amici's proposed bright line rule is consistent with Ciraolo and is readily understandable.

As noted, on December 18, 1987, the district court in *NORML* gave final approval to the Consent Decree in

that case. Part 3(B) defines the helicopter restrictions which we urge this Court to adopt as the bright line zone of privacy:

> 1. Helicopters conducting surveillance shall comply with the provisions of 14 C.F.R. Sections 91.9 (b) and (c), but shall not knowingly fly within 500 feet of any structure, person or vehicle. Helicopters surveying in the vicinity of business or residential structures shall not knowingly fly within the hemisphere extending 500 feet from the outer circumference of the curtilage of any residence.
>
> 2. Except over open fields, helicopters shall maintain an altitude of at least 500 feet except when landing on, loading from, unloading to, or departing from an eradication site or landing zone, or when safety otherwise requires. When ferrying personnel, supplies or cut crops, the helicopters shall take the most direct route available that overflies the fewest possible private residences, unless safety requires otherwise. Where safety or operational feasibility requires deviation from paragraphs 1 and 2 of this section, and/or the pre-planned flight path, the pilot shall file a report documenting the deviation with the team leader and/or lead deputy. When such deviation is known, or can be anticipated prior to the flight, it shall be part of the pre-flight briefing and the pre-flight briefing report.
>
> 3. Identifying numbers and marks on helicopters (and fixed-wing aircraft) shall be clearly identifiable and shall not be covered, defaced, or otherwise obscured.

Amici believe it is important to note that the federal government is a signator to this agreement following a lengthy review process.[4]

A rule prohibiting helicopter surveillance from within a 500 foot hemisphere surrounding the curtilage is consistent with the standard established by this Court in *Ciraolo*. *Ciraolo* holds that naked eye observations made from within the public navigable airspace do not violate reasonable expectations of privacy. In accordance with 49 U.S.C. section 1301(29) and 14 C.F.R. section 91.79 (1988), public navigable airspace over non-congested areas is above 500 feet.

As pointed out by the Florida Supreme Court in the case *sub judice*, this Court's holding in *Ciraolo* does not sanction "an unlimited right to any type of examination of residential property from the air. Indeed, we note the care taken to qualify and limit the permissible observation to the 'naked eye' from 'navigable airspace' at an 'altitude of 1000 feet' in a 'physically nonintrusive manner.'" *Riley v. State*, 511 So.2d 282, 287 (Fla. 1987).

3. Petitioner's proposed rule would not provide clear guidance to law enforcement.

Petitioner argues for a "bright line" rule defined by Federal Aviation Administration Regulations. This rule would enable police to undertake surveillance of the cur-

---

4. We were informed prior to federal approval of the terms of the Consent Decree that its terms received approval from the heads of the criminal, civil and lands divisions of the U.S. Department of Justice and from the Office of the Solicitor General. We believe the review process and approval by the federal government is extremely significant, and lends strong support to our "bright line" proposal.

tilage by fixed-wing aircraft at 1,000 feet or higher, or by helicopter from anywhere "if the operation is conducted without hazard to persons or property on the surface. In addition, each person operating a helicopter shall comply with routes or altitudes specifically prescribed for helicopters by the administrator." 14 C.F.R. section 91.79(d) (1988).

At best, the only guidance this rule provides would be to allow governmental surveillance of the curtilage by helicopter from anywhere—a rule patently contradictory to the unique protections of the curtilage offered by the Fourth Amendment. At worst, petitioner's rule places the Federal Aviation Administration as guardian of Fourth Amendment protections: as F.A.A. regulations change, so too would the boundaries of privacy expectations.

Petitioner's rule would require a case-by-case, *post hoc* analysis of competing expectations of privacy, law enforcement interests, and safety concerns. This is the exact result sought to be avoided by "bright line" rules.

The 500 foot hemisphere rule proposed by Amici, however, could be followed easily by law enforcement officers in the field through the use of altimeters located in the helicopters.

CONCLUSION

The California Attorneys for Criminal Justice and Civil Liberties Monitoring Project respectfully request this Court to decide that the intentional low-flying helicopter intrusion into the sanctity of Riley's curtilage was a Fourth Amendment search requiring probable cause and a search warrant. At a minimum, warrantless helicopter searches are *per se* unreasonable and in violation of the Fourth Amendment when made from within a hemisphere extending 500 feet from the outer circumference of the curtilage.

Respectfully submitted,

RONALD M. SINOWAY, INC.
by RONALD M. SINOWAY
Counsel of Record
P.O. Box 1339
Redway, California 95560
(707) 923-3905
Attorneys for Amici Curiae
CLMP and CACJ

Dated: June 30, 1988

CERTIFICATE OF SERVICE

I, Ronald M. Sinoway, a member of the Bar of this Court, certify that three copies of the Brief of Amici Curiae the Civil Liberties Monitoring Project and California Association for Criminal Justice were served this 30th day of June, 1988, by United States mail, postage pre-paid upon:

Mark H. Salton, Counsel of Record
7714 Massachusetts Avenue
New Port Richey, Florida 34653
Attorney for Respondent Michael A. Riley

Parker D. Thomson, Counsel of Record
Special Assistant Attorney General
4900 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Attorney for the Petitioner The State of Florida

RONALD M. SINOWAY
Counsel of Record
P.O. Box 1339
Redway, California 95560
(707) 923-3905
Attorney for Amici Curiae The Civil Liberties Monitoring Project, California Attorneys for Criminal Justice